

United States District Court
Eastern District of Michigan
Southern Division

United States of America,
Plaintiff,

No. 21-cr-20747

v.

Hon. Terrence G. Berg

D-2 Kyle Allen Kennard,
Defendant.

**Government's Written Proffer In Support of
Detaining Defendant Kyle Kennard Pending Trial**

The United States of America seeks the detention of Kyle Kennard pending trial. This is a partial summary concerning his illegal activities that demonstrate that Kennard poses an unacceptable risk to the community and a risk of non-appearance/flight if he is not detained pending trial.

SUMMARY

Kennard is part of a Drug Trafficking Organization that traffics in kilogram quantities of Fentanyl, Methamphetamine, Cocaine, and other drugs. Kennard, who is known by the street name “Whopp Dog,” participated in large drug transactions and in laundering drug proceeds through multiple monetary transactions. Kennard has used an alias name (“Cajuan Johnson”) at casinos and in certain monetary transactions that constitutes money laundering.

When arrested in this matter, Kennard was uncooperative with police and found in possession of multiple guns. He was at his Trowbridge Street house in Detroit at the time of his arrest, and initially refused to surrender to authorities—it was only after being told that a Canine might have to come in to retrieve him that he surrendered. Once in his house, agents found an assault-type rifle on the stairs with a loaded magazine nearby. A loaded pistol was found in his bedroom, and another loaded pistol with an extended magazine was found in a different room. Ammunition and magazines were also found elsewhere in his house. Kennard has had guns at other times during the conspiracies based upon Instagram posts. Kennard has a lengthy criminal history.

Agents found a hydraulic Kilogram press at Kennard’s house, which is consistent with Kennard being involved in Kilogram-quantity drug trafficking. Kennard also had a digital scale at his house, which is also consistent with Kennard

being involved in significant drug trafficking.

CASE BACKGROUND

In January of 2021, DEA identified Leo TODD as a trafficker of controlled substances. TODD and his Drug Trafficking Organization (DTO), sometimes referred to as “Team Cookies,” are responsible for the distribution of kilogram-quantities of fentanyl, crystal methamphetamine, cocaine, and diverted prescription pills throughout the metropolitan Detroit, Michigan area. Investigators later learned that the DTO smuggles controlled substances primarily between Phoenix, Arizona and Detroit, Michigan, utilizing couriers and checked luggage on commercial airlines, and distributes those illicit substances in various states, including Michigan, Kentucky, and Arizona. The main distribution house and meeting place for the DTO has been identified as 17359 Griggs Street, Detroit, Michigan. A Federal Search Warrant was executed at the Griggs residence on March 2, 2021, and investigators found a drug processing / distribution table and multiple types of drugs, including suspected cocaine (58.5 gross grams), oxycodone pills (13), fentanyl pills (19).

AIRPORT SEIZURE ON OCTOBER 25, 2020

On October 25, 2020, Detroit DEA received information from a Confidential Source (CS) regarding a suspicious bag that was checked from Detroit to Phoenix,

Arizona. The suitcase had a bag tag in the name of co-defendant Kapri OLDHAM, and contained three individual packages of suspected cocaine weighing 1,121 gross grams and \$7,950.00 of US currency.

On October 26, 2020, a female representing herself as OLDHAM (“Woman #1,” who is not currently charged in the Indictment) went to the Detroit Metropolitan Airport to inquire about the location of “her” “lost” luggage. The bag was given to her upon her providing a baggage claim ticket for it. Investigators later stopped and interviewed her. After being advised of her Miranda rights, Woman # 1 agreed to talk to Investigators and stated that she was asked by OLDHAM to ride to the airport with her. That woman stated that OLDHAM asked her to go into the airport to pick up the “lost” baggage. When Woman #1 returned to the car, OLDHAM had left her and ordered a Lyft to give her a ride to Fairlane Mall in Dearborn, Michigan.

During the interview of Woman #1, Investigators requested she call OLDHAM to have her turn herself in. During the phone call, OLDHAM declined to cooperate with the DEA. But OLDHAM discussed this seizure and coordinated her response with KENNARD, as detailed herein:

Investigators observed four videos sent from the Instagram account of "Whopdog" sent on October 26, 2020, and they pertain to the airport seizure that

occurred on October 25, 2020. The account was identified as the account of Kyle Allen KENNARD. The videos show a person (believed to be KENNARD) on three-way conversation monitoring the calls between OLDHAM and the officers. KENNARD is video recording the conversations with another device, which is believed to be the device of co-defendant TODD. The video shows KENNARD on three way, with his phone muted, and is texting. The texts content shows outgoing texts of "yep them pull up"; "On u". At one point the officer asks OLDHAM "can you come talk to me at my office?" and the person texting (Kennard), texts "no". As the conversation between the officer and OLDHAM continue the person texting, sends "Looks like a set up". Investigators believe KENNARD wanted OLDHAM to tell the officers that this "Looks like a set up." Further on in the conversation, the person texting (Kennard) sends "wat chargers". DEA believes KENNARD was telling OLDHAM to ask what she is going to be charged with. In one of the videos, the officers identify the female on the phone as "Kapri."

AIRPORT SEIZURE ON FEBRUARY 8, 2021

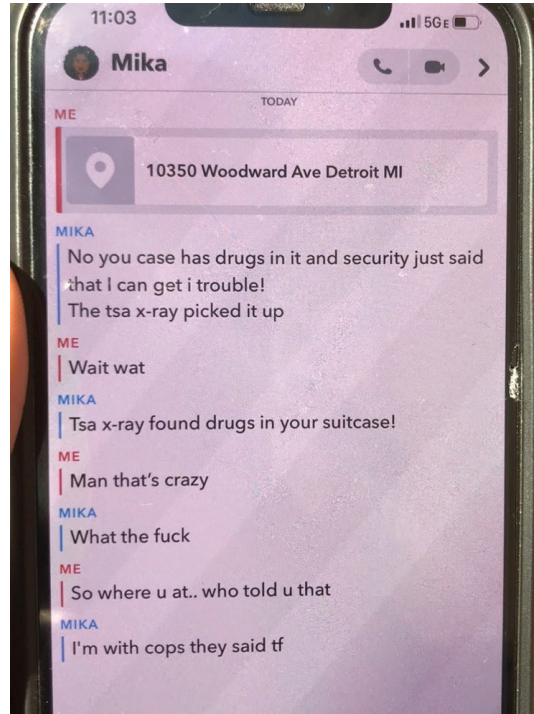
On February 8, 2021, members from the Detroit Metro Airport Police seized approximately 528 grams of Methamphetamine, 129 grams of cocaine, and 3,884 dosage units of suspected Oxycodone from co-defendant Ramika BOAZE during a

consent search of her luggage at the airport. Boaze told investigators that “Whopp Dog” asked her to transport that drug-laden luggage to Detroit. BOAZE could not provide a proper name for “Whopp Dog,” but described him as a black male, mid 40's, approximately 6'3, 240lbs (consistent with Kennard). BOAZE stated “Whopp Dog” paid for a one-way Delta airline ticket on February 8, 2021 from Phoenix to Detroit, Michigan for her, and was paying her to take the suitcase. BOAZE stated her instructions were to order an Uber and take the suitcase to 10350 Woodward Avenue, Detroit, Michigan (the location of a Sonoco gas station that is a short walk from Kennard’s residence).

BOAZE provided a phone number for “Whopp Dog” as 77x-xxx-67xx. Investigators learned that this phone number is registered to co-defendant Cateasha WELLS-Ivy. An open-source database check of the phone number indicated the users of the phone number as Cateasha WELLS-Ivy and Kyle KENNARD, both with an address of 19237 Northrup Street, Detroit, Michigan. Investigators believe 77x-xxx-67xx is utilized by KENNARD and paid for by WELLS-Ivy through her AT&T account, utilizing the address of KENNARD’s mother and a previous address utilized by KENNARD.

BOAZE also stated that she messaged “Whopp Dog” through Snapchat prior to her being questioned by the police and that she usually uses social media applications to communicate with “Whopp Dog”. The following picture is a

screenshot of a conversation from Snapchat (from Kennard's cellphone) that took place between KENNARD, labeled as "ME," and BOAZE, labeled as "Mika,"



KYLE KENNARD'S STREET DRUG SALES

Beginning on February 24, 2021, a red Chrysler 300 bearing Illinois license plate BD37389 was observed at 17359 Griggs Street, Detroit, which is a drug-related house used by the DTO. The vehicle rented in KENNARD's name. Upon KENNARD's arrival at approximately 1:00pm through approximately 4:00pm, at least a dozen individuals arrived on foot and in a vehicle to the location where they remained at the residence for a short stay. DEA believes that a high volume of foot and vehicle traffic in a short time, along with stays that would be considered short

for just a few minutes, is indicative of drug trafficking activities.

KENNARD's INSTAGRAM RETURN: GUNS AND DRUGS

On July 21, 2021, a warrant was authorized in the Eastern District of Michigan for the Instagram of Kyle KENNARD, "WhoppDog". Upon review of the content from the account of KENNARD's account (Whopp Dog), Investigators were able to locate the same videos that are referenced above from the Instagram account of TODD from the airport seizure on October 25, 2020.

Investigators also located several photographs of US currency, casino chips, narcotics and firearms with KENNARD and others from the TODD DTO. After reviewing the content, many of the pictures that contained these items appeared to be within a common location. In what appeared to be the living room of the location, were wood floors, with brown suede like couches, tan colored paint on the walls, and several fold out TV tables. In the kitchen area of the location is what appears to be a grayish brown stone like laminate flooring along with kitchen countertops that are a light tan color with darker speckles, brown cabinets, gray and white tiled backsplash, and a black and stainless-steel gas stove.

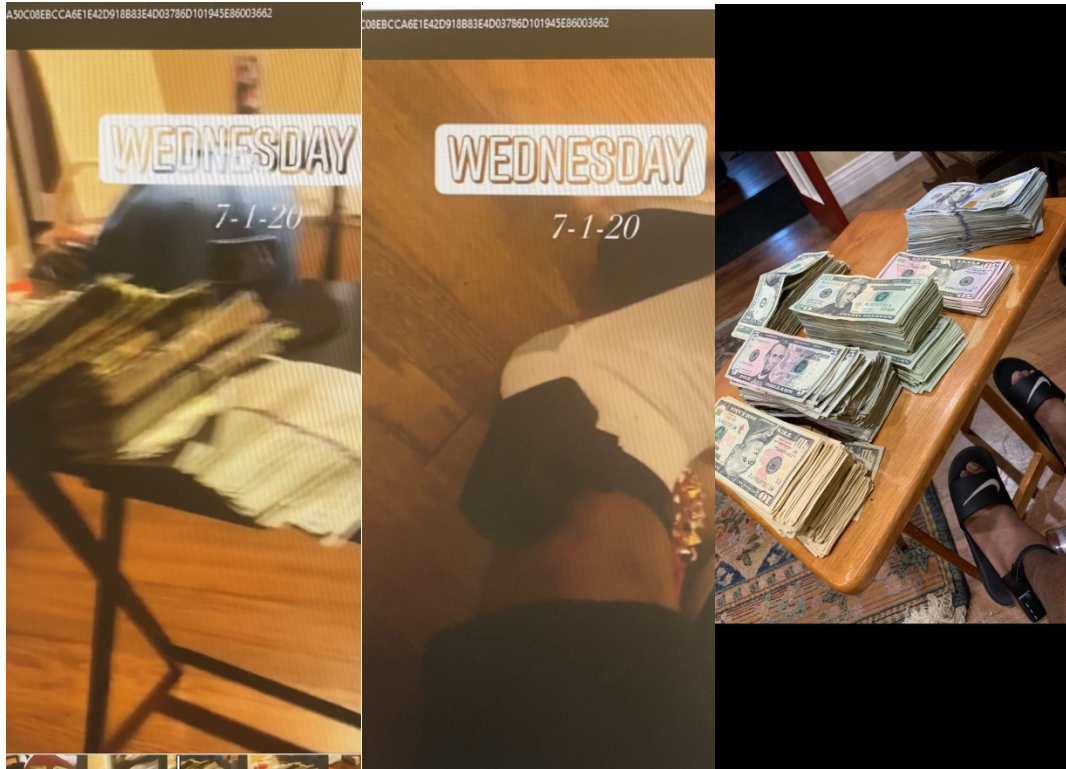
The picture below to the left was dated June 8, 2020 and is believed to be a picture with KENNARD in his living room at the Trowbridge street house, which

is consistent with other pictures located within his Instagram account as indicated by the wood floors, brown suede like sofa and the fold up TV table. KENNARD also regularly wears slides on his feet that are consistently seen in the photographs. The US currency is banded and in Ziploc bags. This method of packaging US currency is indicative of proceeds from drug trafficking. The pictures on the right and bottom are dated July 1, 2020 and is believed to be KENNARD standing in the kitchen holding a portion of what appears to be a portion of a kilogram of cocaine in his hand. KENNARD is wearing Nike slides and the kitchen floor appears to be the same grayish brown stone laminate flooring that is seen on pictures throughout his Instagram account.





Investigators noticed in some of the videos with US currency, narcotics and firearms, that an individual believed to be KENNARD, would commonly show his leg while wearing his Nike slides with a tether that was attached to his leg. The DEA believes that below pictures were taken in the living room with KENNARD's legs and a tether attached inside Trowbridge -- with large amounts of US currency sitting on the fold out television tables which are commonly seen in photos and videos throughout KENNARD's Instagram account.



Investigators contacted Michigan Department of Corrections (MDOC) to inquire about Kyle KENNARD. MDOC located a record for KENNARD that indicated he was on tether and on house arrest from May 14, 2020 through August of 2020 at Kennard's Trowbridge Street house. The videos were dated on Instagram during this time period were dates that KENNARD was under house arrest.

The picture on the left below is dated August 5, 2020 and is believed to be the Trowbridge living room based upon the fact that the picture is from KENNARD's Instagram and also based on the appearance of the wood floors, the foldup TV tables, and the paint color on the walls. The photo shows a large

amount of US currency. The photo on the right is dated November 18, 2020 and indicates the picture was taken in Detroit. DEA believes that the counter is a kitchen counter located within the Trowbridge. The DTO KENNARD is part of is known to traffic in bulk quantities of blue pills that are fentanyl pills, consistent with what is inside the plastic bag.



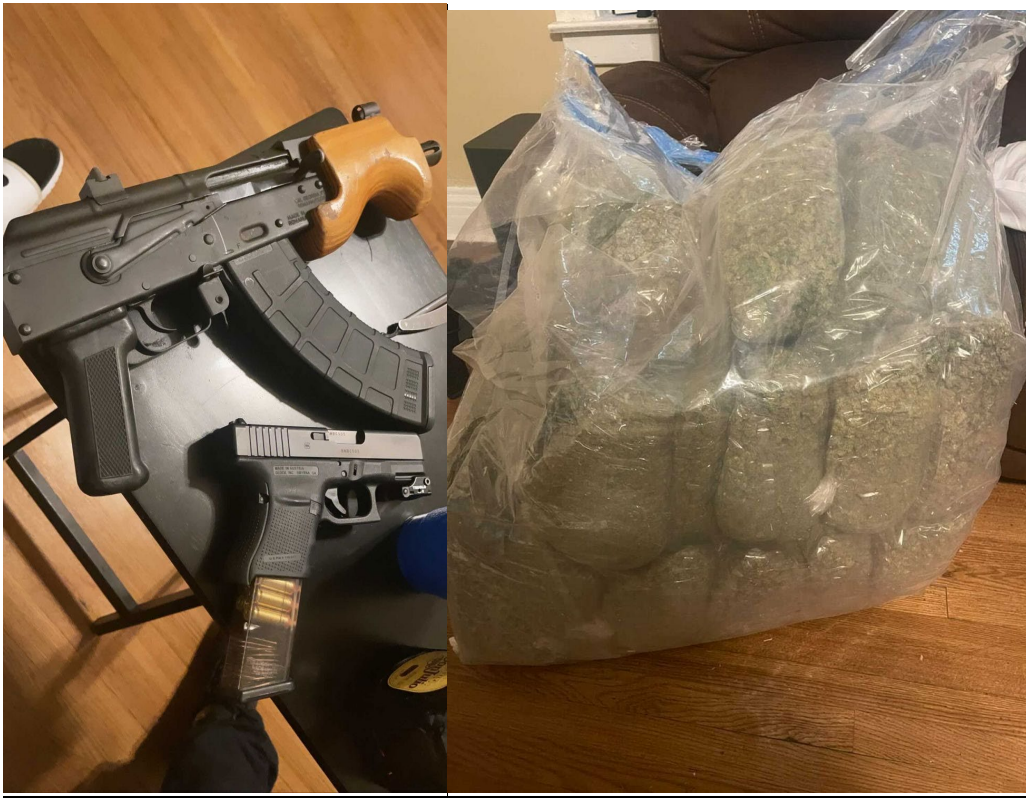
Investigators located pictures of baggage tags below within KENNARD's Instagram account which were dated October 13, 2020 and sent from KENNARD's Instagram account to TODD's Instagram account. The baggage tag shows it was checked in by Cateasha WELLS-Ivy who is a nominee for and co-conspirator of the TODD DTO (sometimes referred to as Team Cookies). The TODD DTO is known to commonly send "ghost" baggage which means someone will purchase a ticket and check in a piece of baggage without actually getting on

the plane. The baggage will then travel to its intended destination and someone will pick it up from the baggage carousel. The TODD DTO will then take a picture of the slip provided by the airlines for baggage claim and send it to another person who is waiting at the destination to recover the luggage. US currency and narcotics are often packed and sent in a ghost bag. This method is used to attempt to thwart law enforcement efforts in identification in the event the baggage is interdicted.



The picture to the left below is dated July 1, 2021 and shows a picture with a Draco firearm and a handgun with an extended magazine. The picture appears to be taken with in the living room of the KENNARD's Trowbridge residence, based upon the picture being in KENNARD's Instagram account and the appearance of the wood floors, the fold up TV table, and what DEA believes to be KENNARD's

foot wearing the Nike slides. The picture on the right is dated July 8, 2021 and appears to be a bulk quantity of suspected marijuana in the Trowbridge living room. The TODD DTO has referred to themselves as TEAM COOKIES; the word COOKIES is a reference to marijuana and the TODD DTO is known to deal in bulk quantities of marijuana.



Investigators located a conversation on the Instagram return between KENNARD and the account of “justmanny602” that took place on May 30 and 31, 2021, in

which KENNARD and “justmanny602” discuss Kennard’s procurement of fentanyl pills (referred to as “Fetty,” “fent,” and “blues”¹):

:

Outgoing – You know wats in HIGH demand

Outgoing - The real and fake Xanax

Incoming – I was gonna say them blues

Outgoing - Bro I know u can go mex

Outgoing – Border

Outgoing – They are like .50 1\$

Incoming – Didn’t know bars too

Outgoing – Here they are 20

Outgoing – 1000 is like 20k bro

Incoming – Damn, that’s flip

Outgoing – Yes

Incoming – Let me see if I can find someone that has em by the thousands

Outgoing – Can’t you get them without a prescription

Outgoing – Only takes 250

¹ In this case, authorities have seized fentanyl pills that are being stamped in blue pills with “M” “30.” During the conversation, references to the “blues,” (fentanyl pills).

Outgoing – All in 3 times

Incoming – Let me see. Let me turn over a couple rocks see what I find real quick

Incoming – I have a homie that has em at 2.75 each. Not the ticket u asking for

Outgoing – Real or fake

Outgoing – N wat color

Incoming – Mexicos

Incoming – Whhites I believe

Outgoing – Find out

Outgoing – Gotta know

Outgoing – Start with 2/3000

Outgoing – All in 4 times

Incoming – Blanks from Mexico

Outgoing – Finding out

Outgoing – Color

Outgoing – N fatty right?

Incoming – The bars or Xanax whatever they call that shit. The blues are the ones u want? 30s? Homies have the blank bars white from Mexico

Outgoing – No

Outgoing – Xanax bars

Outgoing – Ask color

Outgoing – Wat is blank

Incoming – Yea that's wat he has

Incoming – White

Outgoing – Ok

Outgoing – Get a pic

Outgoing – Then Let's do it

Incoming – Ok

Incoming – justmanny602 sent a photo

Incoming – justmanny602 sent a photo

Outgoing – Bet

Outgoing – How much

Outgoing – Are they real Xanax or fetty or wat

Incoming – 2.75

Incoming – He say real

Incoming – But I say Mexico

Outgoing – Fetty in them or Xanax in them

Outgoing – They can be Mexican bars

Incoming – Well there you go homie has em

Incoming – And blues too I guess

Outgoing – Ask that

Outgoing – Is there fatty in them or alrpozam

Incoming – I did wait for a rely

Outgoing – you sent a photo

Outgoing – You sent a photo

Outgoing – I don't care

Outgoing – They want the fent

Outgoing – You sent a photo

Outgoing – They want the fatty bars

TRAFFIC STOP OF CAMPBELL AND SMITH IN KENTUCKY

On September 20, 2021, at 4:30pm (EST), GPS ping data indicated that the TODD's cellular device was in the area of 917 W. Glendale, Phoenix, Arizona. At approximately 5:00pm (EST), the GPS ping data indicated that the phone was in the area of the Phoenix Sky Harbor International Airport.

Investigators verified through Delta that TODD was on Delta flight 1074, which departed at 3:05pm (MST) from Phoenix, Arizona and was scheduled to arrive in Detroit at 9:49pm (EST). Delta records also indicated that TODD

checked two pieces of luggage, one with a total weight of 14 pounds and another with a total weight of 18 pounds.

That same night, based on GPS ping data, co-conspirator Corderalla CAMPBELLS's was in the area of 17359 Griggs Street, Detroit, the DTO stash house. CAMPBELL's ping showed he left the stash house and went to DTW airport. At around the same time, TODD's phone pinged in the area of the Detroit Metro Airport (DTW). At approximately 11:00pm, their phones pinged away from the airport. TODD and CAMPBELL's ping followed the same pattern upon arrival at DTW to 17359 Griggs Street as further detailed below. DEA believes CAMPBELL picked TODD up from DTW and transported him with this luggage back to the TODD DTO Griggs Street stash house.

On September 21, 2021 at approximately 3:38am, GPS data for CAMPBELL's phone, identified the device in the area of 17359 Griggs Street. At approximately 3:51am, pole-cam surveillance observed, two black males, believed to be Perise SMITH and Corderalla CAMPBELL, exit 17359 Griggs Street and get into a black SUV, matching the description of the previously observed Nissan Rogue bearing North Carolina license plate JAY3021 (Enterprise rental vehicle rented to Perise SMITH), that was parked in the driveway. The black male that was wearing a white jacket and black pants carried out a white bag and put it into

the driver's side backseat. He then got into the driver seat of the SUV. The other male, wearing dark in color clothing got into the front passenger side of the vehicle and they departed the area. At approximately 3:53am, the GPS data for CAMPBELL's phone began traveling south and continued out of the Detroit area, traveling south on Interstate 75.

On September 21, 2021 at approximately 09:25 am, Kentucky State Police Troopers conducted a traffic stop on a vehicle that was under surveillance by members of the DEA Lexington Resident Office (LRO) on I-75 South at mile marker 131. Kentucky State police (KSP) advised that they observed the target vehicle decelerate quickly upon their marked cruiser being visible by the target vehicle. (**Note:** Agents are aware that driving methods such as the one observed are often employed by drug traffickers to remain undetected by law enforcement by traveling at or below the speed limit.) KSP advised that the target vehicle then began swerving prior to initiating the traffic stop.

DEA Special Agents (SA) and Task Force Officers (TFO) arrived on scene of the traffic stop and conducted a roadside interview of the suspects. The driver was Perise SMITH and the passenger was Cordarella CAMPBELL. SAs and TFOs took custody of the evidence, to include 3 cell phones, suspected marijuana, and 7 bags of Skittles (candy) but contained blue fentanyl pills in the same manner

from the August 25, 2021 seizure, that were located by Kentucky State Police during the course of their probable cause search of the vehicle.

DEA Lexington read Miranda rights to Perise SMITH to which he waived his rights and agreed to speak about the incident. SMITH advised that he was traveling from Michigan to Atlanta, Georgia to visit family. (**Note:** There was a minimal amount of luggage located in the vehicle for SMITH to be traveling to Georgia to visit family. A backpack was located in the backseat with a small amount of clothing inside). SMITH advised that he did not have knowledge about any narcotics in the vehicle to which he was operating. SMITH stated that he picked the vehicle up from Enterprise Rent-A-Car and that he is clueless as to how the narcotics got into his vehicle. (**Note:** The “Skittles” bags containing fentanyl pills were located in the passenger floor board and not hidden conspicuously to where SMITH may have reasonably not known about the narcotics being in the vehicle.)

DEA believes that on September 20, 2021, TODD left the Glendale residence in Arizona after having packaged narcotics and packing them in his checked baggage. TODD traveled back to Detroit with the checked baggage where co-conspirator CAMPBELL picked up TODD from the airport to transport him and the checked baggage to the stash house. DEA also believes that TODD and

co-conspirators CAMPBELL and SMITH prepared the narcotics to take to Kentucky for distribution upon TODD's arrival back to Detroit where CAMPBELL and SMITH departed to Kentucky thereafter. This incident, and KENNARD's later trip to Kentucky set forth below, demonstrate that the DTO reaches into the State of Kentucky.

On October 30, 2021, GPS pings indicated KENNARD left Detroit and travelled to Louisville, Kentucky. The October 31, 2021 GPS pings indicated that KENNARD travelled from Louisville, KY to Lexington, Kentucky. GPS pings indicated that KENNARD travelled between Lexington and Louisville on a daily basis from October 30 through November 4, 2021.

On November 3, 2021, DEA Louisville Investigators were provided KENNARD's vehicle information, KENNARD's description and photo, and GPS pings. At approximately 5:20p, DEA Louisville observed a black Traverse SUV bearing Michigan license plate DBC5858 turn into the Vines at Stony Brook. The Traverse was observed parked in front of 5421 Governours Way, Louisville, KY, however, did not see any one exit the vehicle. After about 5 to 10 minutes the Traverse departed and DEA Louisville maintained surveillance of the Traverse until arriving at Culver's located at 4630 South Hurstbourne Parkway. DEA Louisville were able to observe KENNARD as the driver of the vehicle. DEA

Louisville attempted to maintain surveillance of KENNARD when he departed but he was driving erratically so surveillance was terminated.

DEA Louisville later submitted an administrative subpoena to the Vines at Stony Brook. It was revealed that an individual (“LS”) was renting out Apartment 5411C. LS is associated with an individual with initials DM, who is a known co-conspirator of the DTO. DEA Louisville was able to confirm DM and KENNARD were utilizing Apartment 5411C.

GPS pings indicated that KENNARD departed Louisville late November 4, 2021 and arrived in the area of the Trowbridge residence at approximately 2:51am. At approximately 3:06am, the GSP pings indicated Kennard was in the area of the Motorcity Casino.

TOLL RECORDS 77x-xxx-67xx, UTILIZED BY KENNARD

Investigators ran toll records for 77x-xxx-67xx, the phone number utilized by KENNARD. The following contacts were made between KENNARD and other co-conspirators of the TODD DTO:

- Between 03/18/2021 through 10/30/2021, phone number 313-xxx-1780, a phone number believed to be utilized by co-conspirator Cordarella CAMPBELL was in contact 291 times.
- Between 03/16/2021 through 09/27/2021, phone number 520-xxx-

7333, a phone number utilized by TODD DTO Cesar GARCIA was in contact 113 times.

- Between 08/23/2021 through 10/20/21, phone number 313-xxx-9301, a phone number utilized by co-conspirator James WELLS was in contact 109 times.

- Between 03/17/2021 through 06/04/2021, phone number 313-xxx-6204, a phone number utilized by TODD DTO courier Angela WHITE was in contact with 67 times. WHITE is a suspected courier of drugs and/or drug proceeds for the DTO.

- Between 04/12/2021 through 08/05/2021, phone number 602-xxx-4054, phone number utilized by co-conspirator Perise SMITH was in contact 16 times. As noted earlier, SMITH transported drugs from Michigan to Kentucky.

KENNARD thus has been in regular contact with DTO Members.

MONEY LAUNDERING BY KYLE KENNARD

This investigation has shown that Cesar GARCIA is a source of supply for the fentanyl pills being distributed by Leo TODD, Kyle KENNARD, Corderalla CAMPBELL, and other co-conspirators. The investigation has also shown that KENNARD and the DTO traffic in other drugs, such as cocaine,

methamphetamine, and marijuana. KENNARD has used a nominee, Cateasha WELLS-Ivy, to assist him in laundering his drug proceeds.

DEA believes that using Casinos can be a way that drug traffickers launder their proceeds. KENNARD had frequented Motorcity Casino and has used the alias name Cajuan Johnson at the casino.

The investigation has further shown that KENNARD and his co-conspirators move their drug proceeds and pay for their drugs with bulk cash, transfers between bank accounts, and by using Zelle and Square Cash APP transfers. Zelle is a peer-to-peer (P2P) payment app that allows you to send and receive money from and into your U.S. bank account to and from the U.S. bank accounts of others. The app can be used on a computer or a mobile device. Square Cash App is a peer-to-peer (P2P) payment app that allows individuals to send and receive money on a financial platform that is not a bank. Instead of an account number, you are identified on the network by your email address, or your phone number, or you can create a unique identifier known as a \$Cashtag. If you receive money, it lands in your Cash App account or you can link Cash App to an existing bank account and use that to transfer money to and from your Cash App account.

Following are examples of how money flowed to and from KENNARD; the convoluted transactions demonstrate how the co-conspirators are trying to mask

the true nature source of the money:

- On October 2, 2020, Kapri OLDHAM deposited \$10,950.00 cash to her PNC bank account at two different ATMs in Detroit, Michigan.
- On October 5 and October 13, 2020, OLDHAM made two P2P transfers for \$1,000.00 each by Zelle from her PNC account to KENNARD'S Bank of America account.
- On October 13, 2020, Cateasha WELLS-Ivy deposited \$6,050.00 cash to her TCF bank account at ATMs in Belleville, and Ypsilanti, Michigan, and then transferred \$2,000.00 by Cash App to KENNARD'S Cash APP account.
- On October 26, 2020, Kapri OLDHAM deposited \$4,780.00 cash to her PNC bank account at an ATM in Redford, Michigan. Following the deposit, OLDHAM made two P2P transfers for \$1,000.00 each by Zelle from her PNC account to KENNARD'S Bank of America account, and sent \$1,500.00 by Cash App from her PNC account to KENNARD'S Cash App account.
- On October 30, 2020, Cateasha Wells-Ivy deposited \$4,232.00 cash to her Bank of America account at an ATM in Ypsilanti, Michigan, and then transferred \$2,500.00 by Zelle to Cesar GARCIA'S JPM Chase account.
- On November 2, 2020, Wells-Ivy transferred \$2,500.00 by Cash App from her TCF bank account to the Cash App account of Cesar GARCIA. WELLS-Ivy noted in her Cash App account that the funds were for "car repairs."

- On November 6, 2020, WELLS-Ivy deposited \$7,200.00 cash to her Bank of America account at a branch in Canton, Michigan. On the same date, WELLS-Ivy transferred \$7,000.00 to KENNARD'S Bank of America account.
- On December 2, 2020, Corderalla CAMPBELL deposited \$3,646.00 cash to his Bank of America account at an ATM in Detroit, Michigan. Following the deposit, CAMPBELL sent \$3,500.00 by Zelle from his Bank of America account to the Bank of America account of KENNARD.
- On December 8, 2020, Corderalla CAMPBELL deposited a total of \$10,000.00 cash to his Bank of America account at two different ATMs (\$5,000.00 at each ATM) in Detroit, Michigan. Following these deposits, CAMPBELL sent \$3,500.00 by Zelle from his Bank of America account to the Bank of America account of KENNARD, and \$2,500.00 by Cash App from his Bank of America account to the Cash App account of KENNARD.
- On January 29, 2021, Corderalla CAMPBELL deposited \$8,500.00 cash to his Bank of America account at an ATM in Detroit, Michigan. Following the deposit, CAMPBELL sent \$7,800.00 by Zelle from his Bank of America account to the Bank of America account of KENNARD, and \$500.00 by Cash App from his Bank of America account to the Cash App account of KENNARD.
- KENNARD received a cash transaction in the name of Dajuan Johnson.

CRIMINAL HISTORY OF KYLE KENNARD

Kyle KENNARD has a criminal history which includes the following:

- a. July 8, 2004: Detroit Police Department, Larceny from a Person; Felony; Guilty; Sentenced 5 years probation
- b. August 27, 2009: Van Burn Township, Michigan, Controlled Substance Deliver, Manufacture Ecstasy, MDMA; Felony; Guilty, Sentence: 2 years jail.

NON-COMPLIANCE, GUNS AND PARAPHERNALIA AT 2/9/22 ARREST

As set forth above, KENNARD would not surrender himself immediately when authorities went to arrest him at his Trowbridge house. His female friend was at Trowbridge; it took her mere moments to comply and surrender. In contrast, KENNARD took about 5 to 8 minutes to come to the door. And he did so only after being told that a Canine might have to come in to retrieve him.

Once inside, agents found a house full of guns, ammunition, and narcotics paraphernalia for drug trafficking. See the attached photos from the February 9,

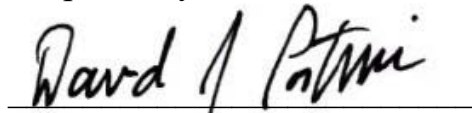
2022 search warrant at KENNARD's residence.

The charges carry a presumption that KENNARD is to be detained as a danger to the community and a risk of flight/non-appearance. He was unwilling to surrender during arrest; and he had three firearms in his house (including an assault-type rifle with a loaded magazine nearby) as well as a loaded pistol in his bedroom and another loaded pistol in another room. He had a kilogram press to form kilos of drugs, and a scale for weighing drugs. These facts, combined with his long-standing drug and gun activity during the conspiracy, and his dexterity with convoluted cash transactions demonstrate that he is a danger to the community and a risk of flight.

CONCLUSION

The Court should Order that KENNARD be detained pending trial.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Portelli", is written over a horizontal line.

David Portelli

Alyse Wu

Assistant U.S. Attorneys

(313) 226-9100

PHOTOS FROM FEBRUARY 9, 2022 SEARCH OF KENNARD'S HOME







